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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLIONIS, EASTERN DIVISION**

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In Re:	)	
	)	Chapter 11
Alfredo Avila and	)	Case No. 15-14355
Teresita Marsal-Avila	)	
	)	
Debtors.	)	
	)	
	)	Honorable Judge Jack B. Schmetterer

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**NOTICE OF MOTION**

PLEASE TAKE NOTICE that on December 29, 2015 at 10:30 a.m., the undersigned will appear before the Honorable Judge Jack B. Schmetterer at the Everett McKinley Dirksen United States Courthouse, located at 219 South Dearborn Street, Room 682, Chicago, Illinois and will then and there present the attached **MOTION FOR ENTRY OF FINAL DECREE**, at which time you may appear if you so choose.

**BY:     S/PAUL M. BACH, OF COUNSEL**  
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**ATTORNEY No: 6209530**

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**MOTION FOR ENTRY OF FINAL DECREE**

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NOW COMES the Reorganized Debtors, Alfredo Avila and Teresita Marsal-Avila, by their attorneys, PAUL M. BACH and PENELOPE N. BACH, of Sulaiman Law Group, Ltd., and ask this Honorable Court to enter a Final Decree, as well as closing this case with a reservation of jurisdiction to reopen this case for any of the reasons stated in the confirmed Chapter 11 Plan and/or Disclosure Statement. In support thereof, the Reorganized Debtors state as follows:

1. On August 20, 2015, the Debtors filed a Voluntary Petition for Relief, according to the provisions of Chapter 11 of the Code.
2. On November 9, 2015, this Court held a hearing and entered an Order pursuant to Section 1129 of the bankruptcy Code confirming the Debtors' Plan of Reorganization.
3. The plan has been substantially consummated within the meaning of Section 1101(2) of the Bankruptcy Code.
4. Debtors request that this Court enter a final decree closing this Chapter 11 case. The final decree should expressly reserve jurisdiction in this Court for all pending matters, all final fee hearings, and those matters enumerated in Article VI of the Plan.

WHEREFORE, the Reorganized Debtors, Alfredo Avila and Teresita Marsal-Avila, ask this Honorable Court to enter a Final Decree closing this Chapter 11 case with an express reservation of jurisdiction as requested in this Motion, and for such other relief as is just and equitable.

Respectively Submitted,

Alfredo Avila and Teresita Marsal-Avila

By: /s/ Paul M. Bach

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